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Attorneys for Defendant  
 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

HASTINGS COLLEGE OF THE LAW, a  
 public trust and institution of higher education  
 duly organized under the laws and the  
 Constitution of the State of California;  
 FALLON VICTORIA, an individual; RENE  
 DENIS, an individual; TENDERLOIN  
 MERCHANTS AND PROPERTY  
 ASSOCIATION, a business association;  
 RANDY HUGHES, an individual; and  
 KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
 FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033 JST

**DECLARATION OF RENEE E. ROSENBLIT  
 IN SUPPORT OF ADMINISTRATIVE  
 MOTION TO RELATE CASES**

Trial Date: Not Set

1 I, Renee E. Rosenblit, declare as follows:

2 1. I am a Deputy City Attorney for the City and County of San Francisco. The facts set  
3 forth in this declaration are stated on my own personal knowledge or, as specified, upon my  
4 information and belief based on official acts and writings.

5 2. On September 16, 2020, I emailed counsel of record for Plaintiffs and Intervenor, and  
6 informed them I would be refiling the motion to relate this action to *Daniel Giosso, James Giosso, and*  
7 *Richard Giosso, Trustees of the Giosso Children's Trust; Mike O'Neill and Sons, a California General*  
8 *Partnership*, 3:20-cv-04255-TSH, ("*Giosso*"), filed on June 26, 2020. I informed counsel that the City  
9 would restate their positions regarding relation articulated last time, unless they have a different  
10 position now. Counsel for Intervenor, Lauren Hansen, responded that Intervenor's position is the  
11 same. Counsel for Plaintiffs, Matt Davis, did not respond as of the time of this filing.

12 3. On September 16, 2020, I also emailed counsel of record, Curtis Dowling, in the  
13 *Giosso* action to ask whether Plaintiffs opposed relation. On September 17, 2020, Mr. Dowling  
14 responded that he does not oppose relation.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
16 true and correct. Executed on September 17, 2020 at San Francisco, California.

17  
18 /s/ Renee E. Rosenblit

19 RENEÉ E. ROSENBLIT  
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**PROOF OF SERVICE**

I, ANNAMARIE DAVIS, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Sixth Floor, San Francisco, CA 94102.

On September 17, 2020, I served the following document(s):

**ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED  
PURSUANT TO CIVIL LOCAL RULE 3-12**

on the following persons at the locations specified:

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in the manner indicated below:

☒ **BY ELECTRONIC MAIL:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail from the electronic address: [annamarie.davis@sfcityatty.org](mailto:annamarie.davis@sfcityatty.org) in portable document format ("PDF") Adobe Acrobat.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed September 17, 2020, at San Francisco, California.




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ANNAMARIE DAVIS